

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INEOS FLUOR AMERICAS LLC,

Plaintiff,

v.

HONEYWELL INTERNATIONAL INC.,

Defendant.

C.A. No. 06-189-SLR

PLAINTIFF'S NOTICE OF DEPOSITIONS

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, plaintiff INEOS Fluor Americas LLC shall take the depositions upon oral examination of defendant Honeywell International Inc. by and through its following employees on the following dates and times:

| | | | |
|-----------------|--|----------------|-----------|
| Sanjeev Rastogi | Global Marketing Manager, Industrial Products Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962 | April 9, 2007 | 9:00 a.m. |
| Nance Dicciani | President and CEO, Specialty Materials Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962 | April 10, 2007 | 9:00 a.m. |
| Jean Balestra | Director of Materials Management, Specialty Materials Honeywell International Inc. 101 Columbia Rd., Morristown, NJ 07962 | April 17, 2007 | 9:00 a.m. |

Each deposition shall be taken at the offices of Axinn, Veltrop & Harkrider LLP, 1370 Avenue of the Americas, 19th Floor, New York, New York 10019, shall continue until completed, and shall be recorded stenographically and, with respect to the depositions of Mr. Rastogi and Ms. Dicciani, videographically, before an officer appointed or designated as specified in Rule 28 of the Federal Rules of Civil Procedure.

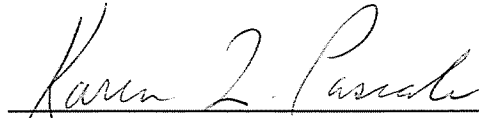
In accordance with Rule 30(b)(5) of the Federal Rules of Civil Procedure, these deponents are requested to produce at their depositions each document in their possession, custody, or control, including without limitation correspondence, electronic mail, and calendar entries, that refers to, relates to, or reflects:

1. The termination, expiration, renewal, or replacement of the HF Contract between Allied-Signal Inc. and ICI Americas Inc. dated as of November 30, 1989 for the supply of HF (the "1989 Contract").
2. Negotiations for or discussions concerning any HF supply agreement between (a) INEOS and Honeywell or (b) Honeywell and Quimica Fluor.
3. Any "hardship provision" in the Heads of Agreement or a new HF supply agreement between INEOS and Honeywell.
4. Honeywell's increase of the price of HF to be supplied to INEOS in 2006.
5. Any meeting, correspondence, or contract between or among Honeywell, Quimica Fluor, or INEOS that refers to, relates to, or reflects HF.

You are invited to attend and examine each witness.

April 5, 2007

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CERTIFICATE OF SERVICE

I, Karen L. Pascale, Esquire, hereby certify that on April 5, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

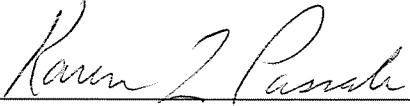
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P.O. Box 1347
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I further certify that on April 5, 2007, I caused a copy of the foregoing document to be served by hand delivery and e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

By E-Mail

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